

HONORABLE RICARDO S. MARTINEZ

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

REBECCA STELMAN, MARK OCHOA,
IAN COLEMAN, CAITLYN
HOLLERBACH, LOUIS WEATHERSTON,
DEMETRIES WRIGHT, JONAS NYARIS,
JANNI SAMUEL, MAIRA HERNANDEZ,
and LINDSAY MOORE, individually and on
behalf of all others similarly situated,

Plaintiffs,

v.

AMAZON.COM INC.; AMAZON
LOGISTICS, INC.; TEM EXPRESS
LOGISTICS LLC dba TEMEX LOGISTICS
and TEML, a Washington limited liability
company; TORITSE ORUBU, individually
and on behalf of the marital community
composed of TORITSE ORUBU and J. DOE
ORUBU; BUTCHIE BOY PRODUCTIONS,
INC. d/b/a EXSELON, a Washington
corporation; JEFFREY BUTCHER,
individually and on behalf of the marital
community composed of JEFFREY
BUTCHER and KATHRYN BUTCHER;
KATHRYN BUTCHER, individually and on
behalf of the marital community composed
of KATHRYN BUTCHER and JEFFREY
BUTCHER; ASTEROIDS GROUP LLC dba
ASTG, a Washington limited liability
company; KINGSLEY ONUCHUKWU,
individually and on behalf of the marital
community composed of KINGSLEY

Case No. 2:22-cv-01632-RSM

**STIPULATION AND ORDER
EXTENDING DEFENDANTS'
DEADLINE TO ANSWER
OR RESPOND TO COMPLAINT**

Noted For: November 21, 2022

STIPULATION AND ORDER
EXTENDING DEFENDANTS'
DEADLINE TO ANSWER OR
RESPOND TO COMPLAINT – 1
CASE NO. 2:22-cv-01632-RSM

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1 ONUCHUKWU and J. DOE
 2 ONUCHUKWU; ANAHIT MANUKYAN,
 3 individually and on behalf of the marital
 4 community composed of ANAHIT
 5 MANUKYAN and J. DOE MANUKYAN;
 6 BENCHMARK TRANSPORT, LLC, a
 7 Washington limited liability company;
 8 DAMIEN WAGNER, individually and on
 9 behalf of the marital community composed
 10 of DAMIEN WAGNER and J. DOE
 11 WAGNER; ALDEN RADONCIC (aka
 12 ALDEN RADD), individually and on behalf
 13 of the marital community composed of
 14 ALDEN RADONCIC and J. DOE
 15 RADONCIC; THE TOTAL PACKAGE
 16 LOGISTICS, LLC, a Washington limited
 17 liability company; JEREMY FIXLER,
 18 individually and on behalf of the marital
 19 community composed of JEREMY FIXLER
 20 and HEATHER FIXLER; HEATHER
 21 FIXLER individually and on behalf of the
 22 marital community composed of HEATHER
 23 FIXLER and JEREMY FIXLER; NANCY
 24 LUNA, individually and on behalf of the
 25 marital community composed of NANCY
 26 LUNA and J. DOE LUNA; ASLAR
 LOGISTICS LLC, a Washington limited
 liability company; LAURA JOHNSON,
 individually and on behalf of the marital
 community composed of LAURA
 JOHNSON and JOSHUA JOHNSON;
 JOSHUA JOHNSON, individually and on
 behalf of the marital community composed
 of JOSHUA JOHNSON and LAURA
 JOHNSON; GOPLAY LOGISTICS LLC, a
 Washington limited liability company;
 TRACY PELLETT, individually and on
 behalf of the marital community composed
 of TRACY PELLETT and J. DOE
 PELLETT; AVANATOR.COM LLC, a
 Washington limited liability company;
 RICHARD ZECH, individually and on
 behalf of the marital community composed
 of RICHARD ZECH and J. DOE ZECH;
 POLE POSITION EXPRESS LOGISTICS
 LLC, a Washington limited liability
 company; DENNIS HANNAH, individually
 and on behalf of the marital community
 composed of DENNIS HANNAH and J.
 DOE HANNAH; TRUE MANAGEMENT
 LLC, a Washington limited liability

STIPULATION AND [PROPOSED] ORDER EXTENDING
 DEFENDANTS' DEADLINE TO ANSWER OR RESPOND TO
 COMPLAINT – 2
 CASE NO. 2:22-cv-01632-RSM

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company; CHRISTOPHER LILLEY, individually and on behalf of the marital community composed of CHRISTOPHER LILLEY and J. DOE LILLEY; B.B.W. HOLDINGS, INC., a Michigan corporation; BARRY WILLIAMS, individually and on behalf of the marital community composed of BARRY WILLIAMS and J. DOE WILLIAMS; PARAGON DELIVERIES INC., a Washington corporation; and JORDAN OFFUTT, individually and on behalf of the marital community composed of JORDAN OFFUTT and J. DOE OFFUTT,

Defendants.

STIPULATION

Defendants Amazon.com, Inc., Amazon Logistics, Inc., TEM Express Logistics LLC d/b/a Temex Logistics, Tortise Orubu, Aslar Logistics LLC, Laura Johnson, Joshua Johnson, Avanator.com LLC, Richard Zech, The Total Package Logistics, LLC, Jeremy Fixler, Heather Fixler, Nancy Luna, Asteroids Group LLC d/b/a ASTG, Kinglsey Onuchukwu, Anahit Manukyan, Butchie Boy Productions, INC. d/b/a Exselon, Jeffrey Butcher, Kathryn Butcher, Paragon Deliveries Inc., Jordan Offutt, True Management LLC, and Christopher Lilley (collectively, the “Served Defendants”) and Plaintiffs hereby STIPULATE AND AGREE to extend the deadline for the Served Defendants to answer or otherwise respond to the Complaint to December 21, 2022.

Defendants Amazon.com, Inc. and Amazon Logistics, Inc. removed this action on November 14, 2022. *See* Dkt. No. 1. Prior to removal, none of the Served Defendants had answered or otherwise responded to the Complaint. Pursuant to Rule 81(c)(2)(C), the Served Defendants’ answer or other response is currently due on November 21, 2022. Counsel for Plaintiffs and the Served Defendants have conferred. In light of the number and complexity of legal issues, and the number of named corporate and individual defendants, as well as the

1 numerous putative classes and sub-classes proposed in Plaintiffs' 41-page Complaint, there is good
 2 cause to grant the parties' stipulated request for additional time so that all parties and the Court
 3 have ample time to address and consider all such issues. Accordingly, Plaintiffs and the Served
 4 Defendants stipulate and agree, subject to the Court's approval, to extend the Served Defendants'
 5 deadline to answer or otherwise respond by 30-days to **December 21, 2022**.

6 This stipulation and order shall not operate as an admission of any factual allegation or
 7 legal conclusion, nor shall it operate as a waiver nor affect any right, defense, claim or objection,
 8 including lack of jurisdiction and the right to seek arbitration of Plaintiffs' claims.

9 *IT IS SO STIPULATED.*

10 DATED this 21st day of November, 2022.

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Jeffrey Butcher, Kathryn Butcher, Paragon
Deliveries INC., Jordan Offutt, True Management
LLC, and Christopher Lilley*

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Attorneys for Plaintiffs and the Proposed Class

ORDER

IT IS SO ORDERED.

DATED this 22nd day of November, 2022.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

Presented by:

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STIPULATION AND [PROPOSED] ORDER EXTENDING
DEFENDANTS' DEADLINE TO ANSWER OR RESPOND TO
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